



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

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November 21, 2000

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: DRAFT OUTLINE FOR PRESCRIBED BURN PLAN

Dear Mr. Reising:

Ohio EPA has reviewed DOE's August 3, 2000 submittal, "Transmittal of the Draft Outline for the Fernald Environmental Management Project Prescribed Burn Plan." Attached are Ohio EPA's comments.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Bill Kurey, USFWS
Pete Yerace, USDOE
Jim Saric, U.S. EPA
Terry Hagen, FDF

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OHIO EPA COMMENTS ON DRAFT OUTLINE FOR PRESCRIBED BURN PLAN

1. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: Ohio EPA does not concur with the proposed deadline of 30 days after DOE issues a final policy on prescribed burns for submittal of the document. DOE should submit a draft sitewide fire management plan and a draft A8P2 savanna project burn plan to the NRTs before March 1, 2000. It is likely that a prescribed burn will be necessary to allow successful establishment of native grasses and forbs in the dense non-native pasture grasses within the A8P2 savanna.

2. Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment:
 Some information included in the project specific burn plan outline that is not in the fire management plan should be included, especially those highlighted in red. See below:

APPENDIX A PROJECT-SPECIFIC BURN PLAN OUTLINE

1. Objective
2. Site information
 - a. Description of burn site
 - i. Topography
 - ii. Description of fuels
 - b. Map of project area with burn site indicated
3. Schedule information
 - a. Burn window
 - b. Anticipated start time
4. Weather factors
 - a. Wind speed limitations
 - b. Wind direction limitations
 - c. Temperature limitations (minimum and maximum)
 - d. Relative humidity limitations (minimum and maximum)
5. Pre-burn site preparation
6. Burn strategy
 - a. Ignition techniques
 - b. Burning techniques

- c. Flame height limitations
- d. Rate of spread limitations
- e. Patrol
- f. Mop-up
- 7. Equipment requirements
- 8. Communications requirements
 - a. Pre-burn contact list
 - b. Post-burn contact list
- 9. Contingency plans
 - a. Emergency contacts
 - b. Termination strategy

Additionally there should be a section describing the reasons for grassland burning (Section I?), specific information about permits required (Section II?), equipment required (Section V?), specifics about safety and training of the fire crew (Section VII D?), cleanup (Section VIII?) and evaluation (see example form at <http://www.npwrc.usgs.gov/resource/tools/burning/appendd.htm>) (Section XI?). I would like to be sure he includes Higgins *et al* (1989) as a reference (see <http://www.npwrc.usgs.gov/resource/tools/burning/burning.htm>).

It is difficult to evaluate without seeing what exactly will be in the sections of the outline and additional changes may be recommended once the entire plan is available for review but this is my initial opinion.